



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

CRH:MAA/IC  
F. #2017R00906

*271 Cadman Plaza East  
Brooklyn, New York 11201*

April 14, 2023

By ECF and Email

The Honorable Pamela K. Chen  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Hu Ji, et al.  
Criminal Docket No. 21-265 (S-1) (PKC)

Dear Judge Chen:

The government respectfully submits this letter to request a one-week extension with respect to the briefing schedule for the parties' motions in limine in advance of the trial scheduled to begin on May 30, 2023 in the above-captioned case. The government has conferred with defense counsel for defendants Michael McMahon, Zhu Yong and Zheng Congying who consent to the extension. This is the government's first request for an extension with respect to the motion in limine briefing schedule.

On June 13, 2022, the Court set a trial date of May 30, 2023 and a briefing schedule that motions in limine be filed by April 24, 2023 with responses to be filed by May 8, 2023. See June 13, 2022 Minute Entry. To allow the parties additional time to confer with regard to potential stipulations in an effort to reduce unnecessary motion practice, the government seeks a one-week extension so that the parties' motions in limine are to be filed by May 1, 2023 and responses to those motions to be filed by May 15, 2023. Given that the

proposed schedule results in briefing on the motions to conclude after the May 10, 2023 final pretrial conference, should the Court require a hearing on the motions, the parties will confer and provide the Court with mutually agreeable dates subject to the Court's schedule.

As such, the government respectfully requests that the parties' motions in limine be due to the Court by May 1, 2023 with responses to be due by May 15, 2023.

Respectfully submitted,

BREON PEACE  
United States Attorney

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cc: Clerk of Court (PKC) (By ECF)  
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